

11. (Amended) A method of retrieving a length of coiled tubing from beneath a surface and storing said tubing on a tubing storage spool comprising:

rotating a reel for receiving said coiled tubing at an angle less than 90° to said surface;

exerting pressure against more than 90° of the circumference of said reel while running said tubing around a portion of said circumference to exert pressure against said tubing to cause positive engagement of said tubing by said reel; and

routing said tubing off of said reel onto said tubing storage spool, said tubing storage spool mounted on a cradle vertically and horizontally adjustable to accept varying spool widths and diameters.

#### REMARKS/ARGUMENTS

This amendment is submitted in response to the Office Action mailed on February 7, 2002, for the merged reexamination/reissue application identified above. All of the claims were rejected for one or more reasons including an objectionable specification, defective reissue oath, indefiniteness and obviousness. All of these rejections have been overcome for the reasons discussed below.

First, the typographical error on p. 8, l. 2, of the specification has been corrected.

Second, a Substitute Reissue Declaration by the Inventor is submitted with this amendment which, it is submitted, identifies at least one error in sufficient specificity, which is relied upon to support the reissue application. The substitute declaration states that "Claim 1 claimed more than permissible in view of a Vita International brochure cited in the Supplemental Disclosure Statement filed on May 1, 2000."

Claims 7 and 8 have been amended to depend from claim 6, which overcomes the rejection based on 35 U.S.C. 112, second paragraph.

Claim 11 has been amended to read that the method of retrieving the coiled tubing is from beneath a surface and that the reel is rotated for receiving the coiled tubing at an angle of less than 90° to the surface. Support for this feature is found in claim 4, and on page 3, lines 6-8 and 14-17, and page 10, lines 15-26. It is submitted that this claim is allowable over

the prior art for same reasons that claim 4 was found allowable, i.e., because the prior art teaches an angle of 90° and does not teach or suggest receiving the coiled tubing at an angle of less than 90°.

For these reasons it is submitted that this application is condition for allowance. If there are any question, call the undersigned at the telephone number indicated below.

Attached hereto is a marked-up version of the changes made to the claims by the current amendment. The attached page is captioned "Version with markings to show changes made."

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 06-2375, under Order No. HO-P02233US0 from which the undersigned is authorized to draw.

Dated: June 21, 2002

Respectfully submitted,

By

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**Version With Markings to Show Changes Made**

7. (Twice Amended) The apparatus of claim [4] 6 wherein said opposed pivotable bullnose arms are horizontally slidably attached to said cradle frame to accept a range of storage spool widths.
8. (Twice Amended) The apparatus of claim [4] 6 wherein said opposed pivotable bullnose arms are vertically slidably attached to said cradle frame to accept a range of storage spool diameters.
11. (Amended) A method of retrieving a length of coiled tubing from beneath a surface and storing said tubing on a tubing storage spool comprising:
- rotating a reel for receiving said coiled tubing at an angle less than 90° to said surface;
- exerting pressure against more than 90° of the circumference of said reel while running said tubing around a portion of said circumference to exert pressure against said tubing to cause positive engagement of said tubing by said reel; and
- routing said tubing off of said reel onto said tubing storage spool, said tubing storage spool mounted on a cradle vertically and horizontally adjustable to accept varying spool widths and diameters.

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